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Nevada Property 1, LLC dba The Cosmopolitan of Las Vegas

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 TONYA HALE,

11 Plaintiff,

12 vs.

13 THE COSMOPOLITAN OF LAS VEGAS;
14 NV PROPERTY 1, LLC dba THE
COSMOPOLITAN OF LAS VEGAS, a
15 Nevada Limited Liability Company;
RICHARD SHERMAN, an individual,

16 Defendants.

Case No. 19-CV-00780-JCM-VCF

**STIPULATION AND ORDER TO EXTEND
DISPOSITIVE MOTION DEADLINE**

Eighth Request

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18 IT IS HEREBY STIPULATED by and between Tonya Hale (“Plaintiff”), and Nevada
19 Property 1, LLC, doing business as The Cosmopolitan of Las Vegas (“TCOLV”) and (collectively
20 referred to as the “Parties”), by and through their respective counsel of record, hereby stipulate to
21 extend the deadline to file dispositive motions in this case, and agree as follows:

22 1. On November 15, 2019, this Court entered an Order granting the initial Stipulated
23 Discovery Plan and Scheduling Order [ECF No. 31] and agreed to extend the initial deadlines on
24 February 5, 2020 [ECF No. 35].

25 2. On April 2, 2020, this Court entered an Order granting the second request to extend
26 the Discovery Plan and Scheduling Order [ECF No. 38], on June 24, 2020 this.

27 3. On June 24, 2020 this Court entered an Order granting the parties third request to
28 extend the Discovery Plan and Scheduling Order [ECF No. 41] and on September 15, 2020 this

1 Court entered an Order granting the parties fourth request to extend the Discovery Plan and
2 Scheduling Order [ECF No. 47].

3 4. On October 20, 2020, this Court entered an Order granting the parties fifth request
4 to extend the Discovery Plan and Scheduling Order. [ECF No. 48]. Pursuant to the Court's order
5 the deadline to file dispositive deadline is December 23, 2020.

6 5. On December 21, 2020, this Court entered an Order granting the parties sixth request
7 to extend the dispositive motion deadline. [ECF No. 51]. Pursuant to the Court's order the deadline
8 to file dispositive deadline is January 25, 2021.

9 6. On January 25, 2021, this Court entered an Order granting the parties seventh
10 request to extend the dispositive motion deadline. [ECF No. 53]. Pursuant to the Court's order the
11 deadline to file dispositive deadline is February 24, 2021

12 6. Defendant's counsel's office was closed for several weeks in December due to staff
13 member testing positive for Covid. Thereafter, Defendants' counsel began experiencing her own
14 medical issues which significantly impacted her vision, which has only recently been fully restored.
15 Accordingly, the parties require an extension to file dispositive motion in this matter. For the above
16 stated reasons, the parties request that the dispositive motion deadline be extended thirty (30) days
17 from to **February 24, 2021 to March 26, 2021.**

18 7. Accordingly, the parties stipulate and agree to extend the dispositive motion
19 deadline for thirty (30) days, up to and including **March 26, 2021.**

20 8. As set forth in ECF No. 53, upon the filing of a dispositive motion, the date for filing
21 the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or
22 until further order of the court.

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9. A trial date has not yet been set in this matter, and no other deadlines are affected by this stipulation.

This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 17th day of February, 2021.

LAW OFFICES OF MICHAEL P. BALABAN JACKSON LEWIS P.C.

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/s/ Lisa A. McClane

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*Attorneys for Defendant Nevada Property 1
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ORDER

IT IS SO ORDERED February 17, 2021.

U.S. Magistrate Judge

4815-2681-5965, v. 1